

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

DOMINICK TALARICO

AKA: DOM TALARICO, DOMINICK JOSEPH  
TALARICO, NICK TALARICO, DOMINICK J.  
TALARICO, DOM J. TALARICO

MAUREEN TALARICO

AKA: MAUREEN L TALARICO, MAUREEN  
LEE TALARICO

CHAPTER 13

Debtor(s)

CHARLES J. DEHART, III  
CHAPTER 13 TRUSTEE

CASE NO: 5-17-02412-JJT

Movant

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DEBTORS' REPLY TO MOTION TO DISMISS CHAPTER 13 CASE

The Debtors, Dominick Talarico and Maureen Talarico, through their Attorney Raymond W. Ferrario, P.C., replied to the Motion by the Chapter 13 Trustee to Dismiss Chapter 13 case for material default.

1. The Debtors recently filed an amended Chapter 13 Plan.
2. The Debtors have signed and are circulating a Stipulation to bring current all post-petition Trustee payments.
3. Debtors have filed a Motion to Garnish Wages to make plan payments.

Debtors request this Court deny the Motion to Dismiss Chapter 13 case.

Respectfully submitted,  
RAYMOND W. FERRARIO, P.C.

by: 

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CERTIFICATE OF SERVICE

I, Raymond W. Ferrario, hereby certify that I served a copy of the Reply to Motion to Dismiss Chapter 13 Case on October 26, 2017, as indicated, below.

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Respectfully submitted,  
RAYMOND W. FERRARIO, P.C.

by: 

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